



217/782-5762

Refer to: 1190400001 -- Madison County  
Granite City Steel  
ILD008873937  
General Correspondence

EPA Region 5 Records Ctr.



320341

July 25, 1988

Mr. Carl E. Cannon  
Granite City Division  
National Steel Corporation  
20th and State Streets  
Granite City, Illinois 62040

Dear Mr. Cannon:

This letter is in response to your letter dated July 11, 1988, regarding the regulatory classification of spilled Spent Pickle Liquor to which lime has been added.

The Agency does not believe that the spill clean-up material is exempt from the RCRA Regulations according to 35 Ill. Adm. Code 721.103 (c)(2)(B)(i) because it is not a sludge as defined by 35 Ill. Adm. Code 720.110. A "Sludge" means any solid, semi-solid or liquid waste generated from a municipal, commercial or industrial wastewater treatment plant, water supply treatment plant or air pollution control facility exclusive of the treated effluent from a wastewater treatment plant.

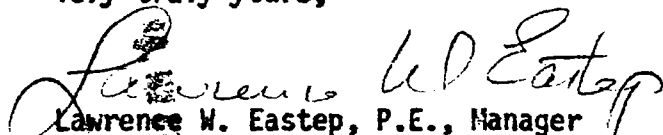
Furthermore, because the Spent Pickle Liquor spill resulted from a failed tank, the requirements of 35 Ill. Adm. Code 725.296 apply. Specifically, the facility must submit a report to the Agency within 30 days of detection of the release. The report must include the information listed in 35 Ill. Adm. Code 725.296(d)(3) and be submitted to the DLPC, Permit Section. The facility must also meet the requirements of 35 Ill. Adm. Code 725.296(e). This section states that the tank system must be closed in accordance with 35 Ill. Adm. Code 725.297(a) and (b) unless the requirements of subsections (e)(2) through (e)(4) are satisfied.



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If you have any questions regarding this letter, please feel free to call Rob Watson at 217/782-6762.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:WPH/dls/2023j, 62-63  


cc: Division File  
Southern Region  
Compliance Monitoring Section  
Rob Watson



WRW  
Pb/Pb/Plc

GRANITE CITY STEEL

1190400001

ILD 008873 937

Granite City Division  
National Steel Corporation  
20th & State Streets  
Granite City, Illinois 62040  
(618) 451-3456

July 11, 1988

TANKS WERE < 90 DAY  
ACCUMULATION TANKS  
PER Mr. CANNON 7-19-88  
WRW

Mr. Larry Eastep  
Manager, Permit Section  
Land Pollution Control Division  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Dear Mr. Eastep:

Subject: Applicability of the Exclusion for Lime  
Neutralized Waste Pickle Liquor to the  
Treatment of Spills

This letter serves to formally request the Illinois Environmental Protection Agency's ("Illinois EPA's" or "the Agency's") opinion on the applicability of a specific hazardous waste exclusion (waste pickle liquor ("WPL") sludge generated by lime stabilization of spent pickle liquor from the iron and steel industry) to immediate spill response and stabilization activities conducted at Granite City Division, National Steel Corporation ("Granite City"). This exclusion is found at 35 Ill. Admin. Reg. Sec. 721.103(c)(2)(B)(i) and 40 C.F.R. Sec. 261.3(c)(2)(ii)(A).

As previously discussed with Rob Watson of your staff, an estimated 3200 gallons of hydrochloric WPL were spilled at Granite City on July 5, 1988. Lime was applied initially to the surface of the spill area. In addition, lime has been and continues to be mixed with the excavated WPL sludge contaminated soil to neutralize and stabilize this material. Mr. Watson indicated that WPL sludge and contaminated soil stabilized with lime during spill response activities are not subject to the State and Federal hazardous waste management standards unless the excavated residue fails a characteristic test. Mr. Watson advised us, however, that in order to obtain written confirmation of Illinois EPA's interpretation of the above-referenced exclusion, a written request must be filed with the Agency.

Please respond to this request at your earliest convenience. If you have any additional questions, please feel free to call me.

Very truly yours,

*Carl E. Cannon*  
Carl E. Cannon

RECEIVED

JUL 14, 1988

IEPA-DLPC

EQC/01.7:sc

cc: John K. Heintz

Chester R. Babst, Esquire

RECEIVED

JUL 28 1988

IEPA-DLPC

SENT TO COMPANY  
SENT BACK TO AGENCY

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

Subject GRANITE CITY STEEL

Data \_\_\_\_\_

Reviewed by Rob Watson

Date 7-21-88

AGENCY RESPONSE TO 7-11-88 LETTER  
REQUESTING THE AGENCY'S OPINION  
ON THE CLEAN UP OF SPILLED K062  
WASTE.

I SPOKE WITH TOM POWELL DLPC/FOS  
ABOUT THE LETTER AND THE CLASSIFICATION  
OF THE SPILL DEBRIS. SPECIFICALLY:  
DOES THE SPILL CLEAN UP DEBRIS  
(ie SOIL, SLAG, etc) ~~RELATE~~ TO WHICH LIME  
HAS BEEN ADDED, QUALIFY FOR THE  
EXEMPTION FOR SLUDGE GENERATED BY  
THE LIME STABILIZATION OF SPENT PICKLE  
LIQUOR PROVIDED BY 35 IAC 721.103(C)(2)(B)(i)?  
OUR DECISION WAS THAT IT DOES NOT  
BECAUSE THE SPILL CLEAN UP DEBRIS  
DOES NOT MEET THE DEFINITION OF A  
SLUDGE AS SPECIFIED IN 720.110.

THE DIFFERENCE APPEARS TO BE THAT A  
~~ONE~~ SLUDGE SHOULD BE A CONSISTENTLY  
~~TO~~ HOMOGENEOUS MATERIAL; WHEREAS THE CHARACTERISTICS  
OF THE CLEAN UP DEBRIS FROM A SPILL  
WILL VARY GREATLY FROM SITE TO SITE  
AND EVEN WITHIN ~~ONE~~ A SINGLE SPILL CLEAN UP.

RECEIVED

JUL 28 1988

IEPA-DLPC